

March 8, 2021

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, DC 20554

Re: *IBFS File No.SAT-MOD-20200417-00037; RM-11768*

Dear Ms. Dortch:

This is to inform you that on March 5, 2021, representatives from Space Exploration Holdings, LLC (“SpaceX”) had a conference call with the office of Acting Chairwoman Rosenworcel. A full list of attendees is provided in Attachment A. SpaceX discussed its proposed modification to complete its safety upgrade by launching its remaining non-geostationary orbit (“NGSO”) satellites to safer operating altitudes, as well as the importance of the 12 GHz Band to provide high-quality service to customers of next-generation satellite systems like Starlink.

SpaceX provided an update on the progress of the Starlink system, reporting that its beta program has been expanding rapidly across much of the nation to otherwise unserved Americans. Starlink customers have already seen speeds double the requirements of the Rural Digital Opportunity Fund and latency at a small fraction of the threshold for a low-latency service. As part of its beta program, SpaceX has provided early service with excellent outcomes to unserved tribal lands, schools, and first responders.

SpaceX has been providing this beta service by operating satellites that the Commission already authorized to operate at 550 km. When granting the authorization for SpaceX’s first 1,584 satellites at this lower altitude (bringing them down from an already approved altitude that would create a far higher likelihood for orbital debris), the Commission recognized that “[i]f the proposed modification does not present any significant interference problems and is otherwise consistent with Commission policies, it is generally granted.”¹ Through several rounds of extensive analysis over the past eleven months, SpaceX has demonstrated definitively that its pending safety upgrade will not “present any significant interference problems” for other satellite operators or terrestrial licensees—just as the Commission found for the first half of this upgrade in 2019. Meanwhile, some of the opponents of this upgrade such as Amazon have apparently abandoned their own systems entirely. Rather, they appear to have chosen to focus their attention on lobbying efforts

¹ *Space Exploration Holdings, LLC*, 34 FCC Rcd. 2526, ¶ 9 (IB 2019) (quoting *Teledesic LLC*, 14 FCC Rcd. 2261, ¶ 5 (IB 1999)).

and regulatory filings meant to delay and obstruct the competitors who are actually launching satellites and providing services.

Finally, SpaceX discussed the many deep flaws in the arguments from the Multichannel Video and Data Distribution Service (“MVDDS”) licensees. After the Commission unanimously rejected the primary proposals from the MVDDS 2016 Petition that would have simply removed systems like Starlink from the 12 GHz band,² the MVDDS licensees have pivoted to a new tactic of working across proceedings in an effort to harm the service Starlink is providing to otherwise unserved Americans across the country. Yet, despite empty claims to the contrary, the MVDDS licensees are still unable to point to any errors in their own technical demonstration that their hoped-for windfall in the 12 GHz Band is incompatible with the high-quality broadband consumers are already receiving from next-generation satellite services. These MVDDS licensees also cannot explain why SpaceX’s modification would make any difference to their plans, when other NGSO systems are already licensed with wider beams and at lower elevation angles in the 12 GHz band. Meanwhile, MVDDS showings of substantial service remain pending, as MVDDS continues to be an empty offering to consumers. In rejecting the varied claims by the MVDDS licensees, the Commission can support services that are actually benefiting Americans, rather than line the pockets of spectrum speculators.

SpaceX continues its rapid deployment of its next-generation Starlink system and is already bringing high-throughput, low-latency broadband service to otherwise unserved Americans. To ensure that this much-needed service is not delayed, SpaceX urges the Commission to expeditiously authorize the completion of its safety upgrade.

Sincerely,

/s/ David Goldman

David Goldman
Director of Satellite Policy

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Attachment

cc: FCC Attendees

² MVDDS 5G Coalition Petition for Rulemaking to Permit MVDDS Use of the 12.2-12.7 GHz Band for Two-Way Mobile Broadband Service, RM-11768 (filed Apr. 26, 2016).

ATTACHMENT A

Office of Acting Chairwoman Rosenworcel
Acting Chairwoman Rosenworcel
Umair Javed

SpaceX
Elon Musk
Mark Juncosa
Tim Hughes
David Goldman

The SpaceX logo is located in the bottom right corner of the page. It features the word "SPACEX" in a bold, blue, sans-serif font. To the right of the text is a stylized, grey, curved line that represents a rocket's trajectory or a wing, extending from the end of the word and curving upwards and to the right.

SPACEX